

IN THE UNITED STATES DISTRICT COURT
FOR THE Western District Of Texas
El Paso Division

FILED

04/05/2018

CLERK OF DISTRICT COURT
WESTERN DISTRICT OF TEXAS

United States of America)

)

V.)

)

NO.)

)

EP:18-M -02122-001

Eric Alejandro FUNEZ-Velasquez
aka

BY _____
DEPUTY

GOVERNMENT'S MOTION TO DETAIN DEFENDANT
WITHOUT BOND AND MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now the United States of America, by and through the United States Attorney for the Western District Of Texas, and files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

I.

The Government at this time moves the Court to hold the above-named Defendant without bond pursuant to 18 U.S.C. § 3142(e) and (f). This request is made for the following reasons:

1. The Defendant is a foreign national, and, as such, presents a high risk of fleeing to avoid prosecution on this charge.

2. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

JOHN F.BASH
UNITED STATES ATTORNEY

/S/ Jose Luis Gonzalez
JOSE LUIS GONZALEZ
Assistant U.S. Attorney
Texas State Bar No. 08129200
700 E. San Antonio, Ste. 200
El Paso, Texas 79901
(915) 534-6884
FAX (915) 534-6024